

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
FELECIA N. HARCUM	:	BANKRUPTCY NO. 23-10694-amc
Debtor	:	
	:	CHAPTER 13
	:	
U.S. BANK, NATIONAL ASSOCIATION,	:	L.B.R. 9014-3
TRUSTEE FOR PENNSYLVANIA	:	
HOUSING FINANCE AGENCY,	:	
Movant	:	HEARING: JUNE 20, 2024
	:	at 11:00 A.M.
vs.	:	Robert N.C. Nix, Sr.
	:	Federal Courthouse
TIKEEIA W. BULLOCK and	:	900 Market Street
KENNETH E. WEST, Trustee	:	Courtroom #4
Respondents	:	Philadelphia, PA 19107

MOTION FOR RELIEF FROM THE AUTOMATIC STAY

TO THE HONORABLE ASHELY M. CHAN, U. S. BANKRUPTCY JUDGE:

AND NOW comes U.S. Bank, National Association, Trustee for Pennsylvania Housing Finance Agency, by its attorneys, Purcell, Krug & Haller, and files this Motion to obtain relief from the automatic stay pursuant to Section 362(d) of the Bankruptcy Code as follows:

1. That this is a contested matter under Rule 9014 brought pursuant to 11 USC Section 362(d).
2. Movant, U.S. Bank, National Association, Trustee for Pennsylvania Housing Finance Agency, is a company with a servicing agent of Pennsylvania Housing Finance Agency with an office located at 211 North Front Street, Harrisburg, Pennsylvania 17101.
3. Respondent, Felecia N. Harcum is an adult individual whose last known address is 4065 Ford Road, Philadelphia, PA 19131.

4. Respondent, Kenneth E. West, is the Trustee duly appointed in the above case with a place of business at 1234 Market Street, Suite 1813, Philadelphia, PA 19107.

5. On or about April 23, 2010, Respondent executed and delivered a Mortgage Note in the sum of \$163,359.00 payable to Huntingdon Valley Bank, which Note is attached hereto and marked Exhibit "A".

6. Contemporaneously with and at the time of the execution of the aforesaid Mortgage Note, in order to secure payment of the same, the Respondent made, executed, and delivered to original Mortgagee, a certain real estate Mortgage which is recorded in the Recorder of Deeds Office of the within County and Commonwealth on April 30, 2010 at Instrument Number 52205515 conveying to original Mortgagee the subject premises. The Mortgage was subsequently assigned to PENNSYLVANIA HOUSING FINANCE AGENCY and was recorded on April 30, 2010 in the aforesaid County at Instrument Number 52205516, Mortgage was subsequently assigned to U.S. Bank, National Association, Trustee for Pennsylvania Housing Finance Agency and was recorded on February 19, 2013 in the aforesaid County at Instrument Number 52600233. The said Mortgage and Assignment are incorporated herein by reference.

7. The land subject to the Mortgage is known and numbered as 4065 Ford Road, Philadelphia, PA 19131.

8. The balance owed Movant is approximately \$156,000.00.

9. Other liens against the property (per Debtor's Schedules):

City of Philadelphia, Tax unit, in the amount of \$3,242.00.

10. The value of the real estate is approximately \$222,120.00 (per Debtor's Schedules), so that there may be equity in the property.

11. Debtor has failed to make three (3) post-petition mortgage payments to Movant in the amount of \$1,417.00 each.

12. Movant is entitled to relief for cause.

WHEREFORE, Movant prays for the entry of an Order terminating the automatic stay and granting Movant leave to exercise its State Court foreclosure rights and that such further relief be granted as your Honorable Court deems fair and equitable.

PURCELL, KRUG & HALLER

By: /s/Leon P. Haller

Leon P. Haller

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Date: May 30, 2024